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Subject: Comments on Yucca Mountain Site Selection Process

This letter provides comments on the process for selecting a site for a repository for U. S. high-level radioactive waste and spent nuclear fuel. It has been prepared because of the national importance of the issue, and is provided in response to a request for comments from the Department of Energy (DOE) published in the Federal Register on August 30, 2001 (66 FR 45845).

The site selection process currently being performed by DOE has involved the active safety and environmental oversight of several other federal organizations – the U. S. Nuclear Regulatory Commission (NRC), who will license the facility; the U. S. Environmental Protection Agency (EPA), who established public health and environmental radiation protection standards for the facility; the Nuclear Waste Technical Review Board, created by statute in 1987 to review the technical and scientific validity of activities performed by the DOE civilian radioactive waste management program; and, indirectly (through EPA), the National Academy of Sciences (NAS).

The 20-year scientific and engineering investigations of the Yucca Mountain site as a possible repository have generated an extensive library of information on the site characteristics and its expected performance in isolating radioactive materials from the biosphere for many thousands of years. This information has also generated some technical disagreements, and there are large uncertainties associated with some aspects of the repository performance estimates. However, I have seen no site characteristics, technical disagreements, or performance uncertainties to date that would disqualify Yucca Mountain as a possible repository.

I am aware that, if the Secretary of Energy, the President, and the Congress decide to proceed with the development of the site, the proponents of the repository will need to make their case before a formal, adjudicatory, licensing hearing, to be conducted before an Atomic Safety and Licensing Board appointed by the NRC. This hearing provides a mechanism for any remaining unanswered questions to be raised by opponents of the repository and resolved in a public forum to the satisfaction of the impartial, technically qualified licensing board.

In my opinion, the Yucca Mountain Science and Engineering Report, the Yucca Mountain Preliminary Site Suitability Evaluation, the Yucca Mountain Total System Performance Analysis, and other technical documentation provide an adequate basis for concluding that the site is suitable for development as a repository. If the Secretary of Energy determines that the scientific and engineering analyses completed to date indicate that the Yucca Mountain Site is likely to meet the applicable radiation protection standards established by the EPA and NRC, I conclude that the Secretary should recommend development of the site to the President.

On balance, after consideration of the technical disagreements and uncertainties associated with the site characterization data and performance analyses, I feel that the information on the site generated to date is sufficient to proceed with the initiation of a formal licensing process for the prospective repository, and that the Secretary of Energy should recommend the Yucca Mountain Site to the President.

Very truly yours,



Fred T. Stetson
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